Our Ref: CAS-308910-D5S1

Your Ref: P/2026/0207

Wrexham County Borough Council
The Guildhall
Wrexham
LL11 1AY

Dyddiad/Date: 02 June 2026

Annwyl Syr/Madam/Dear Sir/Madam,

Bwriad/Proposal: Demolition of existing extension, renovation of existing extension and single storey rear extension

Lleoliad/Location: Pickhill Farm Cross Lanes, Wrexham, LL13 0UL

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales (NRW) about the above, which we received on 18 May 2026.

We have **concerns** with the application as submitted. However, we are satisfied that these concerns can be overcome by attaching the following condition regarding **protected species** to any planning permission granted. Please note, without the inclusion of this condition we would object to this planning application. Further details are provided below.

Protected Species

We note that additional information on great crested newts (GCN) (Environmental DNA (eDNA) Survey Results for Great Crested Newt (GCN), reference PR-0427-24, dated July 2025, prepared by Tyrer Ecological Consultants Ltd) has been submitted in support of the above application following our previous response (CAS-305480-G7R3, dated 07 May 2026). The report has identified that GCN are material to the application site.

GCN and their breeding sites and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981. Where GCN are present and a development proposal is likely to contravene the legal protection, they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three requirements set out in the legislation.

A licence may only be authorised if:

i. The development works to be authorised are for the purpose of preserving public health or safety, or for other imperative reasons of overriding public interest,

including those of a social or economic nature and beneficial consequences of primary importance for the environment;

ii. There is no satisfactory alternative; and,

iii. The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range.

To avoid developments with planning permission subsequently not being granted a licence, the Local Planning Authority should take Planning Policy Wales and Technical Advice Note 5 into account when considering development proposals where a European Protected Species is present. Please note, for the purposes of providing advice at the planning application stage, our comments are limited to compliance with the third test only.

We consider that the above report provides an adequate basis upon which to consider the potential impacts of the scheme on GCN and inform the decision-making process.

The information submitted concludes that the will be no likely effect on GCN, however we advise that further information is required to manage the potential impacts of the scheme. We would be content for this further information to be provided via a suitably worded condition.

We therefore advise that the following condition in respect of GCN is included on any permission granted by your authority.

Condition: No development, including site clearance, shall commence until a Great Crested Newt (GCN) plan of reasonable avoidance measures has been submitted to and approved in writing by the Local Planning Authority. The plan of reasonable avoidance measures should include, but not necessarily be limited to:

- details of fence design, construction, and maintenance including the erection of a one-way amphibian fence, prior to and throughout the duration of construction operations,
- proposals for the clearance of individuals from working areas,
- details of timing, phasing, and delivery of reasonable avoidance measures.

The plan of reasonable avoidance measures shall be carried out in accordance with the approved details.

Justification: To ensure that amphibians (including GCNs) are protected by the development.

Bats

We note that the information submitted in support of the above application (Dusk Survey Results, Pickhill Farm, reference PR-0427-24, dated January 2026, Tyrer Ecological Consultants Ltd) has identified that bats are present at the application site.

From the information submitted, we consider that the proposed development represents a lower risk for bats, as defined in our guidance document "GPG 3 NRW Approach to Bats and Planning".

Bats and their breeding and resting places are protected under the Conservation of Habitats and Species Regulations 2017 (as amended). Where bats are present and a development proposal is likely to contravene the legal protection they are afforded, the development may only proceed under licence issued by Natural Resources Wales, having satisfied the three tests set out in the Regulations (Please also refer to Paragraph 6.3.7 of Technical Advice Note 5: Nature Conservation and Planning). Please note, for the purposes of providing advice at the planning application stage, our comments are limited to the test relating to "demonstration of no detriment to the maintenance of the favourable conservation status of European protected species".

As this is a lower risk case for bats, we consider that the development is not likely to be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in its natural range. We recommend that you discuss the need to secure any avoidance or mitigation measures with your internal ecological advisor.

We advise that the works are carried out under licence. We refer you to the Chief Planning Officer's letter dated 1 March 2018 which advises Local Planning Authorities to attach an informative regarding licence requirements to all consents and notices where European Protected Species are likely to be present on site.

Please note, any changes to plans between planning consent and the licence application may affect the outcome of a licence application.

Protected Sites and Foul Drainage

We note the application site is within the catchment of the River dee and Bala Lake Special Area of Conservation (SAC). In line with our Advice to Planning Authorities for Planning Applications Affecting Nutrient Sensitive River Special Areas of Conservation, under the Habitats Regulations, Planning Authorities must consider the impact of proposed developments on water quality within SAC river catchments. We therefore advise you to consider whether the proposals, as submitted, would increase the volume of foul discharge from the site in planning terms.

We note the application, as submitted, proposes a domestic extension, i.e. an extension to a dwelling house comprising a single household. We refer you to our Advice and the section titled '*What does this mean for domestic extensions*?'

Ultimately it is a matter of judgment for you, as Competent Authority, to satisfy yourselves that the proposed development will not result in a significant effect on the SAC.

Other matters

The advice in this letter relates to matters which are included on our consultation topics list. We do not rule out the potential for the proposed development to affect other environmental interests that are not included on this list.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our website for further details.

If you have any queries about the above, please do not hesitate to contact us.

Yn gywir / Yours faithfully,

Ruth Russell
Uwch Gynghorydd - Cynllunio Datblygu/Senior Advisor - Development Planning
Cyfoeth Naturiol Cymru/Natural Resources Wales

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Croesewir gohebiaeth yn Gymraeg a byddwn yn ymateb yn Gymraeg, heb i hynny arwain at oedi./Correspondence in Welsh is welcomed, and we will respond in Welsh without it leading to a delay.